



Seyfarth Shaw LLP

620 Eighth Avenue
New York, New York 10018

T (212) 218-5500

F (212) 218-5526

jegan@seyfarth.com

T (212) 218-5291

www.seyfarth.com

Application GRANTED. The Initial Pretrial Conference currently scheduled for August 30, 2022, is adjourned to **September 28, 2022, at 4:15 p.m.** The Clerk of Court is directed to terminate ECF No. 14. SO ORDERED.

A handwritten signature in black ink, appearing to be 'Jesse M. Furman', written over a horizontal line.

July 18, 2022

VIA ECF

July 18, 2022

Hon. Jesse M. Furman
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 1105
New York, NY 10007

Re: *Giroto v. ASICS America Corporation, et al.*
Civil Action No.: 1:22-cv-04081-JMF (S.D.N.Y.)

Dear Judge Furman:

This office represents Defendant ASICS America Corporation (“ASICS”) in the above-referenced matter. We write, with the consent of Plaintiff Luigi Giroto (“Plaintiff”), to respectfully request (1) a 30-day extension of the deadline for ASICS and Silkaly M. Wolchok L.P. #1 (“Defendants”) to respond to the Complaint, up to and including, August 20, 2022, (2) an adjournment of the Initial Pretrial Conference scheduled for August 30, 2022, (3) a corresponding extension of the deadline to complete mediation, and (4) a corresponding extension of the deadline to file pre-conference submissions.

By way of background, Plaintiff commenced this action on or about May 18, 2022. (ECF No. 1.) Based on the purported service date of May 31, 2022, ASICS’ responsive pleading was due on June 21, 2022. On June 14, 2022, the Court granted ASICS’ request for an extension of Defendants’ responsive pleading deadlines to July 21, 2022. (ECF No. 11.) On May 19, 2022, the Court scheduled an Initial Pretrial Conference for August 30, 2022 at 4:00 p.m. (ECF No. 7.) Further, per the Court’s May 19, 2022 Order, the parties are to complete mediation by August 16, 2022, and submit pre-conference submissions by August 25, 2022. (ECF Nos. 8, 9.)

The reason for this request is that ASICS and Plaintiff are engaged in meaningful settlement discussions, including an exchange of a proposal that would globally resolve this matter. This is the second request for an extension of the responsive pleading deadline and the first request for an adjournment of the Initial Pretrial Conference and corresponding deadlines. We have communicated with counsel for Plaintiff, and Plaintiff consents to these requests.



Hon. Jesse M. Furman

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The granting of this application will not impact any other scheduled deadlines, and these requests are not intended to cause undue delay. We thank the Court for its time and attention to this matter, and for its consideration of this application.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)